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10 UNITED STATES DISTRICT COURT
11
12 DISTRICT OF NEVADA

13 DIAMOND RESORTS INTERNATIONAL, INC., a) Case No.: 2:17-cv-03007-APG-VCF
14 Delaware corporation; DIAMOND RESORTS)
15 CORPORATION, a Maryland corporation;)
16 DIAMOND RESORTS U.S. COLLECTION)
17 DEVELOPMENT, LLC, a Delaware limited liability) **STIPULATION AND ORDER TO
18 company; and DIAMOND RESORTS) EXTEND TIME TO FILE REPLY
19 MANAGEMENT, INC., an Arizona corporation,) BRIEFS IN SUPPORT OF
20 Plaintiffs,) MOTIONS TO DISMISS
21 vs.) **(FIRST REQUEST)**
22 REED HEIN & ASSOCIATES, LLC, d/b/a)
23 TIMESHARE EXIT TEAM, a Washington limited)
24 liability company; BRANDON REED, an individual)
25 and citizen of the State of Washington; TREVOR)
26 HEIN, an individual and citizen of Canada;)
27 THOMAS PARENTEAU, an individual and citizen)
28 of the State of Washington; HAPPY HOUR MEDIA)
GROUP, LLC, a Washington limited liability)
company; MITCHELL REED SUSSMAN, ESQ.)
d/b/a THE LAW OFFICES OF MITCHELL REED)
SUSSMAN & ASSOCIATES, an individual citizen)
of the State of California; SCHROETER,)
GOLDMARK & BENDER, P.S. A Washington)
professional services corporation; and KEN B.)
PRIVETT, ESQ., a citizen of Oklahoma,)
Defendants.)**

1 Pursuant to Local Rules 6-1 and 7-1, Plaintiffs DIAMOND RESORTS
 2 INTERNATIONAL, INC.; DIAMOND RESORTS CORPORATION; DIAMOND RESORTS
 3 U.S. COLLECTION DEVELOPMENT, LLC; and DIAMOND RESORTS MANAGEMENT,
 4 INC., (“Plaintiffs”), and Defendants REED HEIN & ASSOCIATES, LLC d/b/a TIMESHARE
 5 EXIT TEAM; BRANDON REED; and TREVOR HEIN (“Reed Hein Defendants”) and HAPPY
 6 HOUR MEDIA GROUP, LLC (“Happy Hour”), by and through their respective attorneys of
 7 record, stipulate as follows:

8 **STIPULATION**

9 1. Plaintiffs filed their Complaint on December 6, 2017 [ECF No. 1].

10 2. The Reed Hein Defendants filed a motion to dismiss. [ECF No. 22].

11 3. The Court dismissed certain claims and the individual defendants from the lawsuit
 and allowed Plaintiffs to file an amended complaint. [ECF No. 50].

13 4. Plaintiffs filed their Amended Complaint for Damages and Injunctive Relief
 (“Amended Complaint”) on January 4, 2019 [ECF No. 59].

15 5. The Amended Complaint in this case involves complex claims of business tort,
 16 unfair business practices, and false advertising.

17 6. The parties agreed to an extension of time for Reed Hein Defendants and Happy
 18 Hour to respond to the Amended Complaint until February 28, 2019. [ECF No. 71] and [ECF
 19 No. 73].

20 7. On February 28, 2019, Reed Hein Defendants filed its Motion for Partial
 21 Dismissal of Amended Complaint [ECF No. 87].

22 8. On February 28, 2019, Happy Hour filed its Motion to Dismiss Amended
 23 Complaint. [ECF No. 88].

24 9. The parties agreed to an extension of time for Plaintiffs to file their responses to
 25 Reed Hein Defendants and Happy Hours’ Motions to Dismiss until March 25, 2019 in order for
 26 Plaintiffs to fully brief the legal issues. [ECF No. 94].

27 10. On March 25, 2019, Plaintiffs filed their Memorandum of Points and Authorities
 28 in Opposition to Reed Hein Defendants and Happy Hour’s Motions to Dismiss. [ECF No. 96 and

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1 97]. The Reply Briefs in support of the Defendants' motions are currently due on April 1, 2019.

2 11. Due the numerous legal issues raised by the claims made in this case, and in order
3 to adequately brief the pending motions, the Reed Hein Defendants and Happy Hour request an
4 additional seven (7) days to file their Replies, or until April 8, 2019. This is the first request for
5 extension of time related to the filing of Reply Briefs.

6 12. The undersigned counsel conferred with Plaintiffs' counsel and Plaintiffs do not
7 oppose the extension request.

8 13. This stipulation is not made for purposes of delay.

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1 14. Therefore, the parties agree that the Reed Hein Defendants' and Happy Hour's
2 respective Replies in support of the Motions to Dismiss Amended Complaint are now due on or
3 before April 8, 2019.

4 DATED: March 29th, 2019.

5 DATED: March 29th, 2019.

6 GORDON REES SCULLY MANSUKHANI,
7 LLP

COOPER LEVISON, P.A.

/s/ David T. Gluth

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39 **ORDER**

40 IT IS SO ORDERED.

41 

42 **UNITED STATES DISTRICT JUDGE**

43 DATED: April 1, 2019

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